

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE \$262,655.63 IN UNITED STATES )  
CURRENCY HELD IN BANK OF AMERICA )  
ACCOUNT XXXXXXXXX2872, IN THE ) M.B.D. No.  
NAME OF IMPORTADORA LEVERKUSEN, )  
LLC, SEIZED ON DECEMBER 22, 2022 )

**ASSENTED-TO MOTION TO EXTEND DEADLINE**  
**FOR THE UNITED STATES TO FILE CIVIL FORFEITURE COMPLAINT**

The United States of America, by its attorney, Joshua S. Levy, Acting United States Attorney for the District of Massachusetts, with the assent of the only person to identify themselves as a claimant to date, pursuant to 18 U.S.C. § 983(a)(3)(A), respectfully requests an extension of time to file a civil complaint against the following seized property:

- a. \$262,655.63 in United States currency, held in Bank of America account XXXXXXXXX2872, in the name of Importadora Leverkusen, LLC, seized on December 22, 2022 (the “Property”).

A proposed order is attached to this motion.

The Internal Revenue Service, Criminal Investigation Division (“IRS-CID”) seized the Property and commenced administrative forfeiture proceedings. On or about February 28, 2023, the IRS-CID received a claim for the Property from Harold Velasquez Pulido (the “Claimant”), through his attorney Adrian S. Middleton. No other claims were submitted. On March 3, 2023, the United States received a copy of this claim from IRS-CID. The United States has a 90-day deadline to file a civil complaint against the Property pursuant to 18 U.S.C. § 983(a)(3), which is May 29, 2023.

Pursuant to 18 U.S.C. § 983(a)(3)(A), the Court may extend the time to file a civil forfeiture action upon agreement of the parties. The undersigned Assistant United States Attorney requires additional time to review the seizure and claim of the Claimant and conferred with counsel for the

Claimant on May 17, 2023, regarding this extension. On May 19, 2023, counsel for the Claimant assented to the requested extension.

WHEREFORE, the United States respectfully requests that the Court grant its request and extend the deadline to file a civil forfeiture complaint for an additional 60 days, or up to and until July 28, 2023.

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

By: /s/ Raquelle L. Kaye  
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Dated: May 22, 2023

**CERTIFICATE OF SERVICE**

I, Raquelle L. Kaye, Assistant United States Attorney, certify that the foregoing motion filed through the Electronic Case Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and electronically mailed to attorney Adrian S. Middleton.

/s/ Raquelle L. Kaye  
RAQUELLE L. KAYE  
Assistant United States Attorney

Dated: May 22, 2023